

1 **Stephen Chapman**  
2 Plaintiff In Pro Se  
3 7917 Selma Ave #336  
4 Los Angeles, CA 90046  
(619) 550-7543  
5 **StefinChapman@outlook.co** Email



6 **UNITED STATES DISTRICT COURT**  
7  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 STEPHEN CHAPMAN,  
10 Plaintiff,  
11 vs.  
12 HORACE MANN PROPERTY & CASUALTY CO.,  
13 Defendant

**CASE NO.: 2:24-CV-10546**  
**Hon Michael Fitzgerald**

**NOTICE OF LODGING OF MISSING  
EXHIBITS**

14  
15  
16 **TO THE COURT, ALL PARTIES, AND THEIR**  
17 **ATTORNEYS OF RECORD:**

18  
19 PLEASE TAKE NOTICE that Plaintiff **Stephen Chapman**, appearing **pro se**, hereby lodges  
20 **the following exhibits** with the Court in support of the pending **Motion to Remand**:

- 21  
22 1. **Exhibit No. 7** – Email correspondence from **Marc J. Shrake**, counsel for Defendant,  
23 confirming that the **civil case was not open until December 11, 2024**. This evidence  
24 demonstrates that the **Notice of Removal (NOR) was never properly filed** before the  
25 deadline, rendering it legally non-existent.

1       2. **Exhibit A – Pretrial & Trial Dates Worksheet** – Court-issued scheduling document  
2       reflecting **trial deadlines** and procedural timelines. This worksheet further supports  
3       Plaintiff's argument regarding the procedural improprieties in this case.  
4

5       These exhibits are essential to correct the record and ensure the Court has all pertinent  
6       information regarding **Defendant's improper removal actions and procedural**  
7       **misconduct.**  
8

9       Dated: **03/10/2025**

10      Respectfully submitted,

11      **Stephen Chapman**  
12      Plaintiff In Pro Se  
13      7917 Selma Ave #336  
14      Los Angeles, CA 90046  
15      (619) 550-7543  
16      **StefinChapman@outlook.com**



Re: Chapman v. Horace Mann - Notice of Removal plus supporting docs | Central District Court | 117684

From Marc J. Shrake <MShrake@fmglaw.com>

Date Fri 12/6/2024 5:36 PM

To Connie Spears <connie.spears@fmglaw.com>

Cc stefinchapman@outlook.com <stefinchapman@outlook.com>; Kristin A. Ingulsrud <kristin.ingulsrud@fmglaw.com>

Please send me file marked copies of everything. I did not receive any notice from the court. Please make sure that I am listed as a lawyer on the case with my email address so that I get everything that's filed. Thank you.

Marc

Marc J Shrake  
310-892-3759

Mobile phone communication. Please excuse brevity and typos.

On Dec 6, 2024, at 18:23, Connie Spears <connie.spears@fmglaw.com> wrote:

**Mr. Stephen Chapman**, attached for electronic email service, please find the following documents:

NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441  
CIVIL COVER SHEET  
CERTIFICATE AND NOTICE OF INTERESTED PARTIES  
DECLARATION OF KRISTIN INGULSRUD IN SUPPORT OF NOTICE OF REMOVAL OF ACTION  
UNDER 28 U.S.C. § 1441  
DECLARATION OF MATTHEW RUBIN IN SUPPORT OF NOTICE OF REMOVAL OF ACTION  
UNDER 28 U.S.C. § 1441

Hard copies will follow via U.S. Mail.

Thank you  
**Connie Spears**

Legal Secretary  
**Freeman Mathis & Gary, LLP**  
**550 South Hope Street | Suite 2200 | Los Angeles, CA 90071-2631**  
**D: 213-615-7046**  
Email: [connie.spears@fmglaw.com](mailto:connie.spears@fmglaw.com)  
[www.fmglaw.com](http://www.fmglaw.com) | [Instagram](#) | [Twitter](#) | [Facebook](#)

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[Please read this important notice and confidentiality statement](#)

<2024-12-06 Civil Cover Sheet.pdf>  
<2024-12-06 Notice of Removal.pdf>  
<2024-12-06 Notice of Interested.pdf>  
<2024-12-06 Declaration of Ingulsrud.pdf>  
<2024-12-06 SIGNED Dec of Rubin.pdf>

JUDGE MICHAEL W. FITZGERALD  
SCHEDULE OF PRETRIAL AND TRIAL DATES WORKSHEET

Case No.	2:24-cv-10546-MWF-BFM			
Case Name	Stephen Chapman v Horace Mann Property & Casualty Ins.Co.			
Matter		Plaintiff(s)' Date mo / day / year	Defendant(s)' Date mo / day / year	Court Order
<input checked="" type="checkbox"/> Jury Trial or <input type="checkbox"/> Court Trial <b>(Tuesday at 8:30 a.m.)</b>	7-10 Duration Estimate: _____ Days	October 7, 2025	06/16/2026	
Final Pretrial Conference [LR 16] and Hearing on Motions <i>In Limine</i> <b>(Monday at 11:00 a.m. – <u>three (3) weeks</u> before trial date)</b>		September 15, 2025	05/26/2026	
Motions <i>In Limine</i> must be filed <u>three (3) weeks</u> before this date; oppositions are due <u>two (2) weeks</u> before this date; no reply briefs.				
Event	Weeks Before Trial	Plaintiff(s)' Date mo / day / year	Defendant(s)' Date mo / day / year	Court Order
Last Date to Hear Motion to Amend Pleadings / Add Parties	18 weeks	June 10, 2025	04/15/2025	
Non Expert Discovery Cut Off (at least 4 weeks before last date to hear motions)	18	June 10, 2025	02/10/2026	
Expert Disclosure (Initial)	16	June 24, 2025	01/08/2026	
Expert Disclosure (Rebuttal)		July 8, 2025	02/07/2026	
Expert Discovery Cut Off	14 *	July 8, 2025	03/10/2026	
Last Date to <b>Hear</b> Motions (Monday at 10:00 a.m.)	14	July 14, 2025	03/10/2026	
Last Date to Conduct Settlement Conference	12	July 28, 2025	08/01/2025	
For Jury Trial		September 22, 2025	05/05/2026	
◆ File Memorandum of Contentions of Fact and Law, LR 16 4 ◆ File Exhibit and Witness Lists, LR 16 5.6 ◆ File Status Report Regarding Settlement ◆ File Motions <i>In Limine</i>	6			
For Jury Trial	5	September 29, 2025	05/12/2026	
◆ Lodge Pretrial Conference Order, LR 16 7 ◆ File Agreed Set of Jury Instructions and Verdict Forms ◆ File Statement Regarding Disputed Instructions, Verdicts, etc. ◆ File Oppositions to Motions <i>In Limine</i>				
For Court Trial	3			
◆ Lodge Findings of Fact and Conclusions of Law, LR 52, and Summaries of Direct Testimony				

\* The parties may choose to cut off expert discovery prior to MSJ briefing.

ADR [LR 16 15] Selection:

Attorney Settlement Officer Panel       Private Mediation       Magistrate Judge (with Court approval)

**EXHIBIT A**

Plaintiff objects to ADR in this matter and does not consent to Magistrate Judge referral. Plaintiff maintains that this case has been improperly removed to federal court and is not appropriate for alternative dispute resolution at this time.